

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	No. 22-CR-240 (AKH)
- v. -	:	
	:	
SUNG KOOK (BILL) HWANG and	:	
PATRICK HALLIGAN,	:	
	:	
Defendants.	:	
	:	
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**DEFENDANT PATRICK HALLIGAN’S JOINDER TO  
DEFENDANT SUNG KOOK (BILL) HWANG’S  
MOTION TO EXCLUDE PROPOSED EXPERT TESTIMONY OF  
ROBERT BATTALIO, AMIT SERU, CARMEN TAVERAS,  
AND JOSEPH MASON**

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PLEASE TAKE NOTICE that defendant Patrick Halligan hereby joins in defendant Sung Kook (Bill) Hwang’s motion to exclude certain of the anticipated testimony and opinions of the government’s proposed experts [ECF No. 105, the “Motion to Exclude”]. Mr. Halligan joins the Motion to Exclude in full, and expressly incorporates, adopts, and relies upon the legal authorities and arguments set forth in Mr. Hwang’s supporting memorandum of law [ECF No. 105] as well as the factual matters set forth in the Declaration of Jordan Estes [ECF No. 106].

Mr. Halligan respectfully requests that the Court grant relief to the same and full extent set forth in the Motion to Exclude, including without limitation exclusion of the following anticipated testimony and opinions:

<b>Government's Proposed Expert</b>	<b>Paragraphs of Anticipated Testimony and Opinions that Should Be Excluded</b>
Prof. Robert H. Battalio	4.b, 4.c, 4.d, 5, 6, 6.b, 6.c, 6.d, 6.e., 6.f, 6.g, 7, 7.a, 7.b, 7.c, 7.e, 7.f, 7.g, 7.h, and 8
Prof. Amit Seru	3, 5-6, 9-11
Dr. Carmen A. Taveras	4.B, 4.D, 4.J, 5-7, 9, 10
Dr. Joseph R. Mason	3, 5, 7-11

Dated: New York, New York  
December 19, 2023

Respectfully Submitted,

FRIEDMAN KAPLAN SEILER  
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s/ Mary E. Mulligan

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